

# **Exhibit 4**

**From:** [Brandon Neuman](#)  
**To:** [Briggerman, Lauren](#); [John Branch](#)  
**Cc:** [Behre, Kirby](#); [Herbert, Ian](#); [Marden, Cody](#); [Lee, Calvin](#); [Rand, Ripley](#); [Sam Rosenthal](#); [Matt Gorga](#)  
**Subject:** RE: Azima v. Del Rosso - upcoming depositions of Defendants  
**Date:** Tuesday, August 1, 2023 8:21:21 AM

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**EXTERNAL**

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Lauren,

Thank you for your July 31 letter and amended deposition notice. We are still reviewing your letter and the Court's July 25, 2023 order. However, we are not going to be able to accommodate your request for Mr. Del Rosso's deposition on August 16, 2023. Both Mr. Del Rosso and counsel have prescheduled engagements then. Without waiving our rights regarding the Court's July 25 order, which could either modify or otherwise impact the depositions and other discovery in this matter, Mr. Del Rosso can be available to testify on August 23, 2023 for a maximum of three additional hours—the amount of additional individual deposition testimony Plaintiff sought in his Motion to Compel Further Deposition Testimony (see D.E. 188, p.7). The deposition of VMS could proceed the next day, August 24, 2023, again, subject to our rights to evaluate further relief from the Court and its July 25 order.

Best,

Brandon



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**BRANDON S. NEUMAN** PARTNER

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**From:** Briggerman, Lauren <lbriggerman@milchev.com>

**Sent:** Monday, July 31, 2023 2:41 PM

**To:** Brandon Neuman <brandon.neuman@nelsonmullins.com>; John Branch <john.branch@nelsonmullins.com>

**Cc:** Behre, Kirby <kbehre@milchev.com>; Herbert, Ian <iherbert@milchev.com>; Marden, Cody <cmarden@milchev.com>; Lee, Calvin <clee@milchev.com>; Rand, Ripley <Ripley.Rand@wbd-us.com>

**Subject:** Azima v. Del Rosso - upcoming depositions of Defendants

Counsel,

Please see the attached correspondence related to the upcoming depositions of Defendants Del Rosso and VMS.

Thanks.

Lauren

**LAUREN E. BRIGGERMAN**

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